

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

City of Cleveland v. AmerisourceBergen Drug Corp., et al., Case No. 18-OP-45132 (N.D. Ohio);

The County of Cuyahoga v. Purdue Pharma L.P., et al., Case No. 17-OP-45004 (N.D. Ohio); and

The County of Summit, Ohio., et al., v. Purdue Pharma L.P., et al., Case No. 18-OP-45090 (N.D. Ohio).

MDL No. 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

**PLAINTIFFS' MOTION FOR LEAVE TO
FILE THEIR SECOND AMENDED
COMPLAINTS UNDER SEAL**

Pursuant to Local Rule 5.2, Plaintiffs seek leave of Court to file their Second Amended Complaints in the above-listed cases under seal on Friday, May 18, 2018. Plaintiffs file this Motion and Proposed Order (attached as **Exhibit A**) to ensure compliance with CMO No. 2 (ECF Doc. 441) and the Protective Order Re: DEA's ARCOS/DADS Database (ECF Doc. 167).

Upon completion of the ongoing meet and confer process with Defendants regarding any disputes about what information should be kept confidential, Plaintiffs will file redacted versions of said Second Amended Complaints in the public record. Plaintiffs respectfully request the option to proceed in this manner so there are no inadvertent disclosures of confidential information subject to CMO No. 2 or the ARCOS Protective Order.

WHEREFORE, Plaintiffs respectfully request the Honorable Court to grant Plaintiffs' Motion for Leave to File Their Second Amended Complaints Under Seal.

Dated May 18, 2018

Respectfully submitted,

s/Peter H. Weinberger

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Plaintiffs' Co-Liaison Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of May 2018, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF Systems.

s/Peter H. Weinberger

Peter H. Weinberger

Plaintiffs' Co-Liaison Counsel